

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

ANNA CARTER • Director

May 10, 2019

Dear County Directors of Social Services and Local Purchasing Agencies

Letter Number: SCCA DCDL 2019 - #02

Attention: Directors of County Departments of Social Services

Directors of Other Local Purchasing Agencies

Child Care Coordinators

Other DSS Personnel who work with the Subsidized Child Care Assistance Program

Subject: Child Care Worker and Child Care Supervisor Roles

The purpose of this Dear County Director Letter is to provide clarification about appropriate access to information in NC FAST for Child Care Worker and Child Care Supervisor roles. These are the roles that should be used by staff at a Local Purchasing Agency (LPA) when the county's DSS agency contracts the administration of the Subsidized Child Care Assistance Program.

These two roles should only have access to FNS and Work First income data in order to deem eligibility for the SCCA Program. This information can be found on the FNS/Work First tab found on the evidence dashboard of the product delivery case. If a user finds that this tab does not populate income information in order to deem eligibility, this should be reported immediately to the SCCA Help Desk for investigation and resolution.

Income verification information for Medicaid eligibility cannot be disclosed to any staff not involved in eligibility determination for Medicaid. This restriction is based on the requirement that all disclosures and redisclosures of federal tax information (FTI) by the IRS or an agency that receives FTI from the IRS or other federal agencies in possession of FTI (i.e. Social Security Administration) must be authorized by federal statute. IRS discloses FTI to state human service agencies pursuant to Section 6103(I)(7) of the Internal Revenue Code (IRC) for the purpose of making benefit eligibility determinations. The statute does not authorize human service agencies to redisclose FTI to non-state employees (i.e. contractors) even if it is for the purpose of making benefit eligibility determinations.

When verifying income for an SCCA application, the Child Care Worker shall review the FNS/Work First tab first to determine if eligibility can be deemed. If the recipient is not receiving FNS or WFFA services, income verification should be obtained through other appropriate methods per policy found in section 4050.3 Verification Method Hierarchy of the IEM.

If you have questions about the information in this letter, or other Subsidized Child Care Assistance Program questions, please contact dcdee.subsidy.policy.help@dhhs.nc.gov to reach technical assistance and policy consultation.

Sincerely,

Anna Carter

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